AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

United States Courts Southern District of Texas **FILED**

	Southern District of Texas	January 16, 2025
United States of America v.)	Nathan Ochsner, Clerk of Cour
v.) Case No.	M-25-00091-M
Ricardo Rodriguez, Jr YOB: 1982 United States)))	
Defendant(s)		

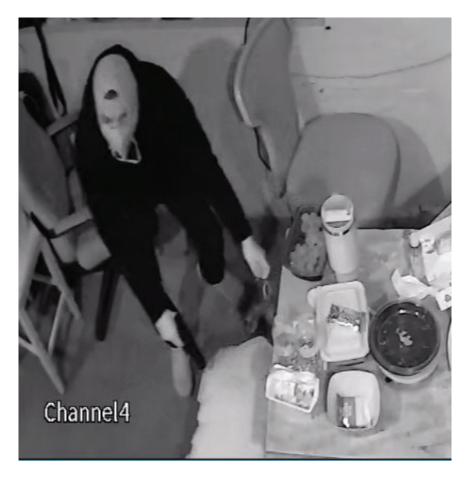
United States Defendant(s))			
CRIMINAL COMPLAINT					
I, the complainant in	this case, state that the fol	lowing is true to the best of my ki	nowledge and belief		
On or about the date(s) of _	January 15, 2025	in the county of	Starr	in the	
Southern District of	f Texas	, the defendant(s) violated:			
Code Section		Offense Description	n		
USC Title 18 Section 1951 Interference wi		th Commerce by Threats or Vi	iolence		
This criminal compla	aint is based on these facts:	:			
1					
See attachment A					
X Continued on the	e attached sheet.				
Approved by AUSA R. Guerra		/s/ Ivan Garza			
		•	plainant's signature	Ott:	
			HSI Task Force	Officer	
Sworn to telephonically a	nd signed electronically	FIIII	ней пите ини ине		
per Fed.R.Cr.4.1					
D 01/16/2025 at F	5:10 n m	1/2	Le		
Date: 01/16/2025 at 5		Jh	ıdge's signature		
City and state: McAllen	Tevas	J. Scott Hacker, U		ludae	
City and state: McAllen	, 16/43		ited name and title	Juuge	

ATTACHMENT A

On January 15, 2025, at approximately 2257 hrs. a member of the Texas Chicano Brotherhood Gang, Ricardo RODRIGUEZ, conducted an aggravated robbery at Total Entertainment in Roma, Texas. Total Entertainment is a gambling establishment which engages in commerce. The establishment was equipped with surveillance cameras which recorded the event.

RODRIGUEZ entered the establishment, brandished a pistol, and demanded money from the two employees present. Rodriguez moved toward an employee and grabbed her hair before pointed the pistol at her head. Rodriguez then went to a second employee and struck her on the head with the pistol. Immediately after being struck on the head, the second employee fell to the floor and hit her head on a gaming machine, causing pain/injury to her head. RODRIGUEZ then kicked the second employee while she was on the ground. RODRIGUEZ demanded "Give the money!"

RODRIGUEZ took U.S. currency from the second employee and from a money bag.



During the robbery, one of the customers was on the phone with a family member. The family member heard the robbery in progress and called the police. Officers from the Roma Police department arrived at the location, entered the establishment, and arrested RODRIGUEZ for aggravated robbery. Due to the robbery, Total Entertainment had to cease operations for the day which obstructed and delayed the business' ability to operate in commerce.

RODRIGUEZ was in possession of the pistol, which was later identified as an "air soft" replicate of a Beretta firearm, in his right rear pocket, and the stolen currency of approximately \$901.00 in U.S. currency. Rodriguez was still wearing a surgical mask and a black mask to conceal his face at the time of arrest. RODRIGUEZ was transported to the Roma Police Department.